

THE  
ROTH LAW FIRM  
PLLC

March 14, 2025

**VIA ECF**

The Honorable John G. Koeltl  
United States District Court  
Southern District of New York  
500 Pearl Street, 14A  
New York, NY 10007-1312

**Re: Kunstler, Hrbek, Goetz and Glass v. The Central Intelligence Agency,  
Pompeo, Morales and Undercover Global S.L., 22 Cv. 6913**

Dear Judge Koeltl:

We represent Plaintiffs in the above-captioned action. We write to request a 7-day extension of time to respond to Your Honor's Order to file a letter addressing the effect of the Court's dismissal of the claims in this case against the CIA on the two defaulting defendants (the "Order"). Dkt. No. 95.

This is Plaintiffs' second request for an extension. The original deadline to file the letter was February 28, 2025. Plaintiffs previously requested a 14-day extension, to which the CIA consented, in order to provide sufficient time for undersigned counsel to confer with Plaintiffs and the CIA about the Order.

The parties met and conferred by telephone on Wednesday, March 12, 2025. During the meet and confer the CIA stated its position that the remaining claims against the two defaulting defendants should be dismissed based on case law. Yesterday, the CIA's counsel provided Plaintiffs' counsel with the case law that they contended supported dismissal of the remaining claims. Plaintiffs request the 7-day extension in order to review the cases relied upon by the CIA before submission of its letter to the Court.

The CIA consents to the requested 7-day extension. If granted, the new deadline would be March 21, 2025.

We thank the Court for its consideration of this request.

Respectfully submitted,



Richard A. Roth, Esq.